

December 10, 2007 Project No. 13636

Mr. J. Ryan Benefield, P.E. Chief, Hazardous Waste Division Arkansas Department of Environmental Quality 8001 National Drive Little Rock, Arkansas 72219-8913

Subject: Fourth Monthly Status Report (November 1 to 30th, 2007)
Cedar Chemical Company Facility ("the Site")
Helena-West Helena, Arkansas
State EPA ID No. ARD990660649

Dear Mr. Benefield:

On behalf of ExxonMobil Chemical Corporation and Helena Chemical Company, which comprise the Cedar Chemical Corporation Joint Defense Group ("the Group"), Geomatrix submits this letter constituting the Fourth Monthly Status Report (November 1 to 30th, 2007) summarizing our work efforts. This status report is being submitted under the scope of work and schedule presented to the Arkansas Department of Environmental Quality (ADEQ) on August 8, 2007. Summarized below are the activities completed in November 2007 and the activities planned for the site in December 2007.

Specific Work Completed in November 2007

General Site Activities

No site activities were performed in November.

Current Conditions Report

• During the August 8, 2007 meeting with ADEQ, Geomatrix proposed the preparation of a Current Conditions Report (CCR) to compile available data and identify supplemental data needs. The final CCR was submitted to ADEQ on November 20, 2007. With the submittal of the report, our proposal then included the following tasks:

Site Investigation Work Plan

Within 60-days following the submittal of the CCR, Geomatrix will submit the Site
Investigation Work Plan to fill the supplemental data needs identified in the CCR. Work
on this task is in progress and the anticipated submittal date to ADEQ is January 18,
2008. The Site Investigation Work Plan will include a schedule for conducting the Site
Investigation and completing the Site Investigation Report.



Mr. J. Ryan Benefield, P.E. Arkansas Department of Environmental Quality December 10, 2007 Page 2

Site Investigation

• Following ADEQ approval of the Site Investigation Work Plan, Geomatrix will complete a site investigation in accordance with the schedule in the Site Investigation Work Plan.

Site Investigation Report

• Following the completion of the site investigation, Geomatrix will submit the Site Investigation Report in accordance with the schedule in the Site Investigation Work Plan.

Feasibility Study

• Following ADEQ approval of the Site Investigation Report, Geomatrix will prepare and submit a Feasibility Study to identify a recommended site remedy.

Other Activities

- On November 26, 2007, Geomatrix informed ADEQ that the Group would conduct a groundwater sampling event at the Site prior to, or sequentially with, the submittal of the Site Investigation Work Plan. The purpose of this event is to begin to gather current baseline groundwater data and to obtain more detailed information regarding the integrity of the monitoring wells. The data from this event will be used to supplement the data gap investigation to be conducted after final ADEQ approval of the Site Investigation Work Plan. Geomatrix and ADEQ also discussed the availability of offsite access agreements for the adjacent properties where monitoring wells exist. ADEQ informed Geomatrix that offsite access was previously granted through verbal communication with the landowner. The Group will work together with ADEQ on a path forward for access to those properties.
- On November 15, ExxonMobil and Helena Chemical jointly circulated to ADEQ and Ansul a draft Separate Agreement as contemplated by Paragraph 20 of the CAO. ADEQ approved the draft Separate Agreement, with minor modifications regarding the parties who would execute the Separate Agreement on behalf of the State. ExxonMobil and Helena Chemical Company agreed to the modifications proposed by ADEQ. Representatives of Ansul deferred discussion of the draft Separate Agreement.
- The third Quarterly Status Report was submitted to ADEQ on November 9, 2007.

Work Planned for December 2007:

General Site Activities

• The only on-site activity planned in December is a site visit to perform a monitor well reconnaissance. This site visit is scheduled for December 12, 2007.



Mr. J. Ryan Benefield, P.E. Arkansas Department of Environmental Quality December 10, 2007 Page 3

Current Conditions Report

This task was completed and the final report submitted to ADEQ on November 20, 2007.

Site Investigation Work Plan

• The Site Investigation Work Plan is being prepared with an anticipated submittal date to ADEQ of January 18, 2008.

Site Investigation

• No activities are planned in December. These activities will follow completion of the Work Plan and approval by ADEQ.

Site Investigation Report

• No activities are planned in December. These activities will follow completion of the site investigation.

Feasibility Study

• No activities are planned in December. These activities will follow completion of the Site Investigation Report and approval by ADEQ.

Other Activities

- The Group hopes to finalize agreement on the Separate Agreement in December.
- The Group expects to discuss off-site access issues with ADEO in December.

Project Issues Pending:

Site access to off-site properties.

Regulatory and Legal Issues Pending:

Order Provision V.16: Maintenance of Escrow:

The escrow account was fully funded as of October 1, 2007, and the escrow funds are available for ADEQ use to reimburse expenses allowed under the CAO.

Order Provision V.20: The Parties agree to negotiate in good faith to reach a separate agreement to conduct a Site investigation ("SI") and feasibility study as may be necessary.

ADEQ, ExxonMobil, and Helena Chemical Company have agreed on the terms of a draft Separate Agreement. Finalization of the Separate Agreement is awaiting response from Ansul, which is expected in December.



Mr. J. Ryan Benefield, P.E. Arkansas Department of Environmental Quality December 10, 2007 Page 4

Meetings and Conference Calls with ADEQ:

 Telephone calls and electronic communication will occur as needed. ADEQ and the Group will meet in Little Rock, Arkansas on December 4, 2007 for the first quarterly meeting between ADEQ and the Group.

If you have any comments regarding this report, please call me at (512) 494-0333.

Sincerely,

GEOMATRIX CONSULTANTS, INC.

Kelly Beck, P.G. Project Manager

cc: ExxonMobil Chemical Company

Helena Chemical Company Tyco Company Managers



Geomatrix

5725 Highway 290 West, Suite 200-B Austin, Texas 78735-8722

ADEQUOI: 722093016 1707 13 12/20/07 NOTIFY SENDER OF NEW ADDRESS 5301 N SHORE DRG NORTH LITTLE ROCK AR 72118 5317

Allamining of anytone and Quelly

Little Rock, Arkansas 77219-8913